

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref Nos. 176 & 573

**DECLARATION OF JAMES L. BROMLEY IN SUPPORT OF DEBTORS' OBJECTION
TO MOTION OF THE UNITED STATES TRUSTEE FOR ENTRY OF
ORDER DIRECTING THE APPOINTMENT OF AN EXAMINER**

James L. Bromley hereby declares as follows:

1. I am a member in good standing of the Bar of the State of New York and have been admitted *pro hac vice* to practice before this Court. I am a partner of Sullivan & Cromwell LLP and am one of the attorneys representing FTX Trading Ltd. and the other Debtors in the above-captioned action. I submit this declaration in support of *Debtors' Objection to the Motion of the United States Trustee for Entry of an Order Directing the Appointment of an Examiner* ("Objection"), filed concurrently herewith.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the transcript of the January 20, 2023 hearing in *In re FTX Trading Ltd.*, No. 22-11068 (Bankr. D. Del.) (Dorsey, J.).

¹

The last four digits of FTX Trading Ltd.'s and Alameda Research Ltd.'s tax identification numbers are 3288 and 1725 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

3. Attached hereto as **Exhibit 2** is a true and correct excerpted copy of the transcript of the November 22, 2021 hearing in the action captioned *In re Mallinckrodt PLC*, No. 20-12522 (Bankr. D. Del.) (Dorsey, J.).

4. Attached hereto as **Exhibit 3** is a true and correct copy of the transcript of the January 11, 2023 hearing in *In re FTX Trading Ltd.*, No. 22-11068 (Bankr. D. Del.) (Dorsey, J.).

5. Attached hereto as **Exhibit 4** is a true and correct excerpted copy of the transcript of the May 16, 2018 hearing in the action captioned *In re EV Energy Partners*, No. 18-10814 (Bankr. D. Del.) (Sontchi, J.).

6. Attached hereto as **Exhibit 5** is a true and correct excerpted copy of the transcript of the June 17, 2020 hearing in the action captioned *In re Paddock Ents., LLC*, No. 20-10028 (Bankr. D. Del.) (Silverstein, J.).

7. Attached hereto as **Exhibit 6** is a true and correct excerpted copy of the transcript of the May 12, 2010 hearing in the action captioned *In re Visteon Corp.*, No. 09-11786 (Bankr. D. Del.) (Sontchi, J.).

8. Attached hereto as **Exhibit 7** is a true and correct excerpted copy of the transcript of the October 31, 2007 hearing in the action captioned *In re Am. Home Mortg. Holdings*, No. 07-11047 (Bankr. D. Del.) (Sontchi, J.).

9. Attached hereto as **Exhibit 8** is a true and correct excerpted copy of the transcript of the June 13, 2008 hearing in the action captioned *In re IdleAire Techs. Corp.*, No. 08-10960 (Bankr. D. Del.) (Gross, J.).

10. Attached hereto as **Exhibit 9** is a true and correct copy of the transcript of the December 18, 2020 hearing in the action captioned *In re Cred Inc.*, No. 20-12836 (Bankr. D. Del.) (Dorsey, J.).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in New York, New York on January 25, 2023

/s/ James L. Bromley
James L. Bromley